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February 2, 2024

Via ECF

Hon. Robert M. Levy, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: First Motion Requesting Extension of Time to File First Amended Complaint until
February 19, 2024, from February 5, 2024:**
1:23-cv-06962-MKB-RML *Hu v. Whaleco, Inc*

Your Honor,

We represent the Plaintiff in the above referenced matter. We write with the consent of the Defendant's Counsel to respectfully request a further two weeks' extension to file the First Amended Complaint until February 19, 2024, from February 5, 2024. All prior requests were granted.

On September 20, 2023, the Plaintiff initiated the complaint against the Defendant. *See* Dkt. No. 1. The Defendant's deadline to file their response to the complaint was extended until January 8, 2024. *See* Elec Order dated Nov. 29, 2023. The deadline for Defendant's time to Answer Plaintiff's Complaint was stayed due to Plaintiff's anticipated first amended complaint. Accordingly, this Court set the deadline for Plaintiff's to file their First Amended Complaint by February 5, 2024. *See* Elec. Order Dated. Jan. 9, 2024. The plaintiff seeks an extension due to the trial commitments in another case this week, limiting their availability to work on amending the complaint. No party to this action will be prejudiced if the said request is granted.

For the foregoing, reasons mentioned above, Plaintiff's respectfully request this Court to set the deadline to file the first amended complaint be February 19, 2024.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Aaron Schweitzer

Aaron Schweitzer, Esq.
Attorney for Plaintiff

Cc: all counsel of record *via* ECF
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